

UNITED STATES DISTRICT COURT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

LOCAL UNION NO. 98	:	
INTERNATIONAL BROTHERHOOD OF	:	
ELECTRICAL WORKERS, et al.	:	Civil Action No. 11-4579
	:	
Plaintiffs	:	
	:	
v	:	
	:	
RGB SERVICES, LLC, et al.	:	
	:	
Defendants	:	
	:	

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**DECLARATION OF COUNSEL**

I, Steven F. Marino, Esquire declare as follows:

1. I am a member of the law firm of Marino, Conroy & Coyle and was the assigned responsibility to participate in the prosecution of the above referenced matter. I am submitting this declaration in support of my firm's application for an award of attorneys' fees in connection with services rendered in the above-entitled action in the course of this litigation.

2. This firm is counsel of record for the plaintiffs.

3. The total number of hours spent on this litigation by my firm is 408.14. The total lodestar amount for attorney/paralegal time based on the firm's current rates is \$81,994.24. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Steven F. Marino	(P)	10.43	\$275.00	2,869.17
	(A)	322.61	\$225.00	72,588.75
David McMurray	(PL)	75.10	\$85.00	\$6,536.32

<b>TOTAL:</b>			\$81,994.24
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(P) Partner  
(A) Associate  
(PL) Paralegal

4. The firm of Marino, Conroy & Coyle incurred expenses in connection with the prosecution of this litigation equal to \$11,192.39.

5. The total value of professional services rendered by the firm of Marino, Conroy & Coyle and expenses incurred expenses in connection with the prosecution of this litigation equals \$93,186.63 [see copies of detail statements of Attorney Hours (Partner), Attorney Hours (Associate), Paralegal Hours and Costs attached hereto and marked as Exhibit A].

6. The hours dedicated to prosecuting this matter is recorded in the firm's accounting system. The expenses incurred pertaining to this case are reflected in the accounting system and books and records maintained by the firm. The accounting system, books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred.

7. I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

**MARINO, CONROY & COYLE**

By:

STEVEN F. MARINO, ESQUIRE

Dated: 5/3/13

# Exhibit A

**RGB Services**

Date	Memo	Amount
	Attorney Hours (322.61661*225.00)	72,588.75
	Attorney Hours (10.43*275.00)	2,869.17
	Paralegal Hours (75.10*85.00)	6,536.32
	Costs	<u>11,192.39</u>
		<u><u>93,186.63</u></u>

Date	Memo	Hours	Amount
03/11/10	Correspondence to RGB Services	0.33333	75.00
03/11/10	Entry into inner office memo	0.20000	45.00
03/11/10	t/c RGB Services, LLC	0.20000	45.00
03/11/10	Internet search to verify contact information	0.60000	135.00
03/11/10	Correspondence Brian Burrows	0.33333	75.00
03/26/10	t/c Ed Coppinger	0.10000	22.50
03/26/10	t/c Ed Coppinger	0.20000	45.00
04/08/10	t/c from Ed Coppinger	0.10000	22.50
04/08/10	Correspondence from Debra Gerber and attachments	0.30000	67.50
04/08/10	Review Payroll Audit, papers and associated correspondence	0.40000	90.00
04/08/10	Inner office filing	0.33333	75.00
06/03/10	Review case file and bond language	0.75000	168.75
06/15/10	File activation - Bond Claim	0.40000	90.00
06/15/10	Correspondence Pennsylvania National Mutual Insurance Company	0.60000	135.00
06/15/10	Correspondence to Brian Burrows	0.33333	75.00
06/15/10	Correspondence to Ed Coppinger	0.33333	75.00
06/15/10	Correspondence to Jeff Scarpello, Esquire	0.33333	75.00
06/16/10	Update Litigation Report	0.60000	135.00
07/12/10	Prepare draft Complaint - USDCEDPA	2.60000	585.00
07/12/10	Research biographic information of company	0.70000	157.50
07/13/10	Revise draft Complaint - USDCEDPA	0.40000	90.00
07/19/10	Review activity entries entered 7/15/10	0.30000	67.50
08/23/10	Update Litigation Report	0.30000	67.50
09/02/10	Review correspondence forwarded by Robert Cocco, Esquire	0.30000	67.50
09/03/10	Entry into inner office memo	0.33333	75.00
09/03/10	t/c Robert Cocco, Esquire	0.30000	67.50
09/03/10	Review correspondence and attachments forwarded by Robert Cocco, Esquire	0.33333	75.00
09/15/10	t/c Christy Daly of Pennsylvania National Mutual Casualty Insurance Company	0.20000	45.00
09/15/10	Entry into inner office memo	0.20000	45.00
09/16/10	Update Litigation Report	0.20000	45.00
11/16/10	t/c from Judge Padova's chambers	0.10000	22.50
11/16/10	t/c Judge Padova's chambers	0.20000	45.00
11/16/10	Update Litigation Report	0.30000	67.50
11/22/10	Legal research and preparation of draft of response to 12(b)(6) motion to dismiss and supportin...	2.60000	585.00
11/23/10	t/c Jacqueline Coyle of Novak Francella	0.10000	22.50

Date	Memo	Hours	Amount
11/23/10	Entry into inner office memo	0.10000	22.50
11/23/10	t/c Debbie Gerber	0.20000	45.00
11/23/10	t/c Eddie Coppinger	0.20000	45.00
11/23/10	t/c from Jacqueline Coyle of Novak Francella	0.20000	45.00
11/23/10	Entries into inner office memo	0.30000	67.50
11/23/10	Legal research and prepare draft of Memorandum of Law in Opposition to 12(b)(6) motion to dismiss	3.60000	810.00
11/24/10	t/c Ed Coppinger	0.20000	45.00
11/24/10	Finalize Memorandum of Law in Opposition to 12(b)(6) motion to dismiss	3.40000	765.00
11/24/10	Review correspondence and attachments provided by Ed Coppinger	0.33333	75.00
01/31/11	Correspondence From Judge Padova Re: PTC on 2-17-11	0.30000	67.50
01/31/11	Update file and memos	0.30000	67.50
01/31/11	Review memorandum and order from J. Padova	2.00000	450.00
02/17/11	Review Court Order	0.30000	67.50
02/17/11	Update Litigation Report	0.30000	67.50
02/17/11	Review Opinion of Judge Padova	1.40000	315.00
02/28/11	t/c Ed Coppinger	0.11667	26.25
02/28/11	t/c from Judge Padova's chambers	0.20000	45.00
02/28/11	Prepare Rule 16 Conference Memo	0.75000	168.75
03/01/11	Update Litigation Report	0.40000	90.00
03/01/11	Appear and participate in Rule 16 Conference convened by Judge Padova	3.00000	675.00
03/02/11	t/c Brian Burrows	0.20000	45.00
03/03/11	t/c Brian Burrows	0.10000	22.50
03/03/11	Prepare draft of Complaint	1.80000	405.00
03/03/11	Review Trust Agreements establishing H&W Fund, Pension Fund, Vacation Fund, Apprentice Training ...	2.60000	585.00
03/04/11	Conference Ed Coppinger, Jacqueline Coyle and witness	2.50000	562.50
03/21/11	t/c Ed Coppinger	0.10000	22.50
03/22/11	t/c Ed Coppinger	0.20000	45.00
03/24/11	review file and order	1.00000	225.00
04/04/11	t/c E. Coppinger Re meeting	0.10000	22.50
04/04/11	t/c Matt Weisberg, Esquire	0.20000	45.00
04/04/11	Entry into inner office memo	0.20000	45.00
04/04/11	Entry into inner office memo	0.20000	45.00
04/04/11	Entry into inner office memo	0.20000	45.00
04/04/11	Correspondence from Matt Weisberg, Esquire	0.30000	67.50

Date	Memo	Hours	Amount
04/04/11	t/c Matthew Weisberg, Esq.	0.30000	67.50
04/04/11	Correspondence Ed Coppinger	0.30000	67.50
04/04/11	t/c Ed Coppinger	0.30000	67.50
04/04/11	Correspondence Matthew B. Weisberg, Esquire	0.33333	75.00
04/05/11	Meet with E. Coppinger Re: RGB Meeting	0.40000	90.00
04/05/11	Update file and memo	0.40000	90.00
04/18/11	t/c Ed Coppinger	0.20000	45.00
04/18/11	Conference with RGB Services and counsel	2.50000	562.50
04/19/11	Correspondence to Richard Romagnoli	0.33333	75.00
04/19/11	Correspondence to Ed Coppinger	0.33333	75.00
05/20/11	t/c Jeff Scapello, Esquire	0.20000	45.00
05/20/11	Entry into inner office memo	0.30000	67.50
05/20/11	Conference Ed Coppinger	0.75000	168.75
06/13/11	Prepare draft Complaint	2.00000	450.00
06/15/11	Complete draft Complaint	1.75000	393.75
06/29/11		3.45000	776.25
07/12/11	Revise draft Complaint	2.40000	540.00
07/15/11	Revise draft Complaint after consultation with Ed Coppinger and Jeff Scarpello, Esq	1.75000	393.75
07/22/11	Draft Notice of Lawsuit, Request for Waiver of Summons and Waiver of Summons	0.75000	168.75
07/22/11	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
07/22/11	Correspondence to Michael Metikis	0.33333	75.00
12/30/11	Prepare Plaintiffs' Response In Opposition Defendants Motion to Consolidate and Dismiss	3.10000	697.50
12/31/11	t/c Detective Ed Trotter	0.10000	22.50
12/31/11	t/c Detective Ed Trotter	0.20000	45.00
12/31/11	ECF Plaintiffs' Response In Opposition Defendants Motion to Consolidate and Dismiss	0.60000	135.00
12/31/11	Finalize Plaintiffs' Response In Opposition Defendants Motion to Consolidate and Dismiss	3.75000	843.75
12/31/11	Correspondence to Matthew Weisberg, Esq	0.33333	75.00
01/10/12	Review court order	0.20000	45.00
01/16/12	t/c Ed Coppinger	0.10000	22.50
01/16/12	t/c Ed Coppinger	0.10000	22.50
01/16/12	t/c Ed Coppinger	0.20000	45.00
01/17/12	Entry into inner office memo	0.30000	67.50

Date	Memo	Hours	Amount
01/17/12	t/c from Ed Coppinger	0.30000	67.50
01/17/12	Update litigation report	0.40000	90.00
01/17/12	Oral argument before Judge Padova USDCEDPA	2.60000	585.00
01/23/12	Entry into inner office memo	0.30000	67.50
01/23/12	Update Litigation Report	0.30000	67.50
01/23/12	Prepare Plaintiffs' Initial Disclosures	2.40000	540.00
01/23/12	Review defendants' Initial Disclosures	0.70000	157.50
01/23/12	Telephone conference with USDCEDPA Magistrate Judge Rice	0.33333	75.00
01/23/12	Correspondence to Matthew B. Weisberg, Esquire	0.33333	75.00
01/23/12	Correspondence Mr. Ed Coppinger	0.33333	75.00
01/24/12	Revise draft of Plaintiffs' Initial Disclosures	0.60000	135.00
01/25/12	Review correspondence and grievance decision of the Labor Management Committee dated December 1...	0.40000	90.00
01/28/12	Review correspondence forwarded by Graham Baird, Esq	0.30000	67.50
01/28/12	Review Defendant's Initial	0.40000	90.00
02/09/12	Draft Notice of Deposition of Michael Metsikas	0.30000	67.50
02/09/12	Correspondence to Matthew Weisberg, Esq.	0.33333	75.00
03/12/12	t/c from Judge Padova chambers	0.30000	67.50
03/12/12	Correspondence Judge Padova	0.33333	75.00
03/12/12	Correspondence to Matt Weisberg Esq	0.33333	75.00
03/15/12	Inner office meeting with paralegals assigned to assist in prosecution	0.60000	135.00
03/15/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
03/15/12	Draft Notice of Deposition	0.33333	75.00
03/16/12	Correspondence to Ed Coppinger	0.33333	75.00
03/16/12	Inner office filing	0.33333	75.00
03/16/12	Correspondence Matthew B. Weisberg, Esquire	0.33333	75.00
03/19/12	Prepare for deposition of Michael Metsikas	4.20000	945.00
03/20/12	Correspondence to Matt Weisberg, Esq.	0.33333	75.00
03/20/12	Draft Notice of Deposition of Michael Metiskas	0.33333	75.00
03/23/12	Deposition of Michael Metsikas	8.60000	1,935.00
04/10/12	t/c Judge Padova chambers	0.20000	45.00
04/10/12	Telephone conference Magistrate Judge Rice	0.30000	67.50
04/10/12	Entry into inner office memo	0.30000	67.50
04/10/12	Correspondence Ed Coppinger	0.33333	75.00
04/13/12	Review court order entered by Magistrate Judge Rice	0.30000	67.50
04/13/12	Correspondence to Ed Coppinger	0.33333	75.00



Date	Memo	Hours	Amount
04/13/12	Correspondence to Jacquelyn Coyle	0.33333	75.00
04/13/12	Correspondence to Deb Gerber	0.33333	75.00
04/13/12	Correspondence to Edgar Soto	0.33333	75.00
04/13/12	Correspondence to Son Tuy	0.33333	75.00
04/13/12	Correspondence to Marco Rivera	0.33333	75.00
04/27/12	Correspondence to Matthew Weisberg, Esq	0.30000	67.50
05/03/12	Correspondence to Jacquelyn Coyle	0.30000	67.50
05/03/12	Correspondence to Ed Coppinger	0.30000	67.50
05/03/12	t/c Ed Coppinger	0.30000	67.50
05/03/12	Inner office memo to paralegals	0.30000	67.50
05/03/12	Correspondence to Matthew Weisberg, Esq	0.33333	75.00
05/22/12	Deposition prep Ed Coppinger and Jacqueline Coyle	4.00000	900.00
05/25/12	Deposition Ed Coppinger	2.50000	562.50
05/25/12	Deposition Jacqueline Coyle	3.00000	675.00
05/25/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
06/04/12	Copy and binding	0.30000	67.50
06/04/12	t/c Ed Coppinger	0.30000	67.50
06/04/12	Review report generated by defendant's experts Chad Staller and James Markham	0.75000	168.75
06/04/12	Correspondence to Ed Coppinger	0.33333	75.00
06/04/12	Correspondence to Jacqueline Coyle	0.33333	75.00
06/04/12	Review correspondence forwarded by Matt Weisberg, Esq	0.33333	75.00
06/04/12	E-mail Ed Coppinger along with attachments	0.33333	75.00
06/05/12	t/c Matt Weisberg, Esq.	0.20000	45.00
06/05/12	Conference call Magistrate Judge Rice	0.30000	67.50
06/05/12	Entry into inner office memo	0.30000	67.50
06/07/12	t/c from Ed Coppinger	0.30000	67.50
06/07/12	Entry into inner office memo	0.30000	67.50
06/14/12	Review correspondence forwarded by Chambers of Phil Restrepo	0.40000	90.00
06/21/12	t/c to Ed Coppiger	0.20000	45.00
06/21/12	t/c to Marco Rivera	0.20000	45.00
06/21/12	Entries into inner office meme	0.20000	45.00
06/22/12	Prepare inner office memo to paralegals	0.30000	67.50
06/22/12	Inner office meeting with paralegals	0.40000	90.00

Date	Memo	Hours	Amount
06/22/12	Entry into inner office memo	0.60000	135.00
06/22/12	Conference Ed Coppinger and Marco Rivera	4.00000	900.00
07/02/12	t/c Ed Coppinger	0.20000	45.00
07/02/12	Entry inner office memo	0.20000	45.00
07/02/12	Conference with Ed Coppinger	0.60000	135.00
07/05/12	Draft Subpoena to Comworks	0.33333	75.00
07/05/12	Draft Subpoena to Video Visions	0.33333	75.00
07/05/12	Draft Subpoena to Playnetwork	0.33333	75.00
07/05/12	Draft Subpoena to LinkSource	0.33333	75.00
07/05/12	Draft Subpoena to Speed Wire	0.33333	75.00
07/05/12	Correspondence to Comworks	0.33333	75.00
07/05/12	Correspondence to Video Visions	0.33333	75.00
07/05/12	Correspondence to Playnetworks	0.33333	75.00
07/05/12	Correspondence to LinkSource	0.33333	75.00
07/05/12	Correspondence to Speed Wire	0.33333	75.00
07/06/12	Draft Subpoena to Spencer Technologies	0.33333	75.00
07/06/12	Draft Subpoena to Network Engineering Technologies	0.33333	75.00
07/06/12	Draft Subpoena to CrossCom National	0.33333	75.00
07/06/12	Draft Subpoena to Dave & Buster's	0.33333	75.00
07/06/12	Correspondence to Spencer Technologies	0.33333	75.00
07/06/12	Correspondence to Network Engineering Technologies	0.33333	75.00
07/06/12	Correspondence to CrossCom National	0.33333	75.00
07/06/12	Correspondence to Dave & Buster's	0.33333	75.00
07/06/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
07/17/12	t/c from the chambers of Magistrate Judge Rice	0.20000	45.00
07/17/12	Participated in telephone discovery conference convened by United States Magistrate Judge Rice	0.30000	67.50
07/17/12	Update Litigation Report	0.40000	90.00
07/17/12	Entries into inner office memo	0.33333	75.00
07/17/12	Review correspondence forwarded by opposing counsel Matt Weisberg, Esq.	0.33333	75.00
07/17/12	Review 2nd correspondence forwarded by opposing counsel Matt Weisberg, Esq.	0.33333	75.00
07/23/12	t/c Jill Valachovic - Dave & Busters	0.20000	45.00
07/23/12	Reivew Court Order	0.30000	67.50
07/23/12	Entry into inner office memo	0.30000	67.50
07/23/12	Review correspondence and billing records forwarded by PlayNetwork, Inc.	0.75000	168.75

Date	Memo	Hours	Amount
07/23/12	Review correspondence and billing records forwarded by Dave & Busters	0.90000	202.50
07/23/12	Prepare Settlement Conference Memo	2.10000	472.50
07/23/12	Participate in Settlement Conference - US Magistrate Philip Restrepo	2.60000	585.00
07/23/12	Correspondence to Judge Restrepo	0.33333	75.00
07/24/12	Review Defendants' Motion for Summary Judgement	1.10000	247.50
07/24/12	Review docket entry of Magistrate Judge Phil Restrepo	0.20000	45.00
07/24/12	Conference Brian Burrows and Pat Bianculli, Esq	1.20000	270.00
07/24/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
07/25/12	t/c Jacqueline Coyle	0.10000	22.50
07/25/12	t/c Rich Romagnoli	0.10000	22.50
07/25/12	t/c Novak/Francelli	0.20000	45.00
07/25/12	Review e-mail correspondence forwarded by Jacqueline Coyle	0.20000	45.00
07/25/12	Prepare draft of response in opposition to Defendants' Motion for Summary Judgement	5.50000	1,237.50
07/25/12	Review deposition testimony of Jacqueline Coyle	0.70000	157.50
07/26/12	Prepare draft of response in opposition to Defendants' Motion for Summary Judgement	6.70000	1,507.50
07/27/12	Prepare draft of response in opposition to Defendants' Motion for Summary Judgement	4.20000	945.00
07/27/12	Prepare draft of response in opposition to Defendants' Motion for Summary Judgement	4.50000	1,012.50
07/31/12	Amend Affidavit of Deb Gerber	0.40000	90.00
08/01/12	t/c Ed Coppinger	0.10000	22.50
08/01/12	t/c from Ed Coppinger	0.30000	67.50
08/01/12	Conference Ed Coppinger	1.20000	270.00
08/01/12	Entry into inner office memo	0.33333	75.00
08/01/12	Correspondence to Judge Rice	0.33333	75.00
08/01/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
08/07/12	t/c Jacquelyn Coyle	0.30000	67.50
08/08/12	t/c Pat Bianculli, Esq.	0.20000	45.00
08/08/12	t/c Brian Burrows	0.20000	45.00
08/08/12	Review Court Order	0.40000	90.00
08/08/12	Correspondence to PlayNetwork	0.33333	75.00
08/16/12	t/c from Sue Soover of Play Network	0.10000	22.50
08/16/12	t/c Sue Soover of Play Network	0.20000	45.00
08/16/12	Entry into inner office memo	0.30000	67.50
08/17/12	Entry into inner office memo	0.20000	45.00
08/17/12	t/c Sue Hoover of Play Network	0.30000	67.50
08/21/12	t/c from Magistrate Judge Timothy Rice's chambers	0.30000	67.50

Date	Memo	Hours	Amount
08/21/12	Entry into inner office memo	0.30000	67.50
09/04/12	Review correspondence from Jacqueline Coyle	0.30000	67.50
09/04/12	Review business records produced by Play Network in response to subpoena	0.75000	168.75
09/04/12	Review business records produced by CrossCom in response to subpoena	1.20000	270.00
09/04/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
09/04/12	Correspondence to Ed Coppinger	0.33333	75.00
09/17/12	Prepare draft of Pre-Trial Memorandum	0.75000	168.75
09/18/12	Finalize Pre-Trial Memorandum	2.40000	540.00
09/18/12	Correspondence to Matt Weisberg, Esquire	0.33333	75.00
09/18/12	Inner office filing	0.33333	75.00
09/20/12	t/c Jacqueline Coyle	0.30000	67.50
09/21/12	Review Notice of Deposition	0.30000	67.50
09/21/12	t/c Jacqueline Coyle	0.30000	67.50
09/21/12	Review Notice of Trial Deposition	0.30000	67.50
09/21/12	Correspondence from Matt Weisberg, Esquire	0.33333	75.00
09/24/12	Review correspondence forwarded by Matt WEisber, Esquire	0.20000	45.00
09/24/12	t/c Ed Coppinger	0.20000	45.00
09/24/12	Review Notice of Video Tape Trial Deposition	0.30000	67.50
09/24/12	Draft Subpoenas to appear for trial - Brian Burrows, Ed Coppinger, Debra Gerber, Jacquelyn Coyle...	0.75000	168.75
09/24/12	Prepare Proposed Stipulation of Undisputed Facts	4.20000	945.00
09/24/12	Correspondence to Brian Burrows	0.33333	75.00
09/24/12	Correspondence to Ed Coppinger	0.33333	75.00
09/24/12	Correspondence to Debra Gerber	0.33333	75.00
09/24/12	Correspondence to Jacquelyn Coyle	0.33333	75.00
09/24/12	Correspondence to Rich Romagnoli	0.33333	75.00
09/24/12	Correspondence to Edgar Soto	0.33333	75.00
09/24/12	Correspondence to Son Tuy	0.33333	75.00
09/24/12	Correspondence to Marco Rivera	0.33333	75.00
09/24/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
09/24/12	Review correspondence forwarded by Mat Weisberg, Esq	0.33333	75.00
09/25/12	t/c Jacqueline Coyle	0.30000	67.50
09/25/12	t/c Matthew B. Weisberg, Esq.	0.30000	67.50
09/25/12	Entry into inner office memo	0.33333	75.00
09/25/12	Correspondence Matthew B. Weisberg, Esq.	0.33333	75.00

Date	Memo	Hours	Amount
09/26/12	Review correspondence forwarded by Matt Weisberg, Esq.	0.20000	45.00
09/26/12	Correspondence to Matt Weisberg	0.20000	45.00
09/26/12	t/c Matt Weisberg, Esq.	0.20000	45.00
09/26/12	Entry into inner office memo	0.20000	45.00
09/26/12	Correspondence to Jacqueline Coyle	0.20000	45.00
09/26/12	Review correspondence forwarded by Jacqueline Coyle	0.40000	90.00
09/26/12	Prepare cross examination of James Markham	3.40000	765.00
09/26/12	Revise Proposed Stipulation of Undisputed Facts	0.60000	135.00
09/27/12	t/c Ed Coppinger	0.10000	22.50
09/27/12	t/c Ed Coppinger	0.10000	22.50
09/27/12	t/c Ed Coppinger	0.10000	22.50
09/27/12	Entry into inner office memo	0.20000	45.00
09/27/12	t/c Ed Coppinger	0.30000	67.50
09/27/12	t/c Jacqueline Coyle	0.30000	67.50
09/27/12	Review supplemental reports generated by Jacqueline Coyle	0.75000	168.75
09/27/12	Prepare Trial Binders	1.20000	270.00
09/27/12	Prepare w/n for trial: Marco Rivera; Edgar Soto; Song Tuy	2.60000	585.00
09/27/12	Trial deposition James Markham, Ph.d.	4.20000	945.00
09/28/12	t/c Magistrate Judge Rice Chambers	0.20000	45.00
09/28/12	Entry into inner office memo	0.20000	45.00
09/28/12	Review correspondence forwarded by Matt Weisberg, Esq. regard stipulation of undisputed facts	0.20000	45.00
09/28/12	t/c United States Magistrate Judge Timothy R. Rice's chambers	0.20000	45.00
09/28/12	t/c Jacqueline Coyle	0.20000	45.00
09/28/12	t/c Marco Rivera	0.20000	45.00
09/28/12	t/c Edgar Soto	0.20000	45.00
09/28/12	t/c Song Tuy	0.20000	45.00
09/28/12	Correspondence Matt Weisberg, Esq. and revisd stipulation of undipsuted facts	0.30000	67.50
09/28/12	t/c Ed Coppinger	0.30000	67.50
09/28/12	Revise Stipulation of Undisputed Facts	0.60000	135.00
09/28/12	Review revised expert report generated by Jaqueline Coyle and attachmments	1.20000	270.00
09/28/12	Entries into inner office memo	0.70000	157.50
09/28/12	Review correspondence forwarded by Matt Weisberg, Esq.	0.33333	75.00
09/30/12	Pepered Trial Binder	0.40000	90.00
09/30/12	Trial Preparation: prepare presentation of evidence; direct examinations and cross examination o...	9.20000	2,070.00

Date	Memo	Hours	Amount
10/01/12	t/c United States Magistrate Judge Timothy R. Rice's chambers	0.20000	45.00
10/01/12	t/c Jacqueline Coyle	0.20000	45.00
10/01/12	t/c Edgar Soto	0.20000	45.00
10/01/12	t/c Song Tuy	0.20000	45.00
10/01/12	t/c Marco Rivera	0.20000	45.00
10/01/12	t/c Ed Coppinger	0.30000	67.50
10/01/12	t/c from Matt Weisberg, Esq	0.30000	67.50
10/01/12	Completed and revised Trial Binder	0.60000	135.00
10/01/12	Copy and bind trial exhibits	0.90000	202.50
10/01/12	Prepard excel spreadsheet - monies paid regarding PCB, Inc.	1.20000	270.00
10/01/12	Entries into inner office memo	0.70000	157.50
10/02/12	t/c Ed Coppinger	0.10000	22.50
10/02/12	Entry into inner office memo	0.20000	45.00
10/02/12	Particpate in telephone conference with Magistrate Judge Rice	0.30000	67.50
10/02/12	Entry into inner office memo	0.40000	90.00
10/02/12	Inner office memorandum to trial team	0.40000	90.00
10/02/12	Conference with trial team	0.60000	135.00
10/02/12	Draft Subpoenas to appear for trial - Ed Coppinger, Jacquelyn Coyle, Edgar Soto, Son Tuy, Marco ...	0.75000	168.75
10/02/12	t/c from Mr. Ed Coppinger	0.33333	75.00
10/02/12	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
10/02/12	Correspondence to Ed Coppinger	0.33333	75.00
10/02/12	Correspondence to Edgar Soto	0.33333	75.00
10/02/12	Correspondence to Son Tuy	0.33333	75.00
10/02/12	Correspondence to Marco Rivera	0.33333	75.00
10/02/12	Correspondence to Jacquelyn Coyle	0.33333	75.00
10/08/12	Review correspondence forwarded by Matt Weissberg, esquire dated October 2, 2012	0.30000	67.50
01/25/13	Confrence - Ed Coppinger;Jaquelyne Coyle; Marco Rivera - trial preparation	3.00000	675.00
01/27/13	Trial preparation	6.50000	1,462.50
01/28/13	Preparation for trial - prior to appearing in court	4.00000	900.00
01/28/13	Trial - District Judge Magistrate Timothy Rice	8.00000	1,800.00
01/29/13	Preparation for trial - after return from court	6.50000	1,462.50
01/29/13	Trial - District Judge Magistrate Timothy Rice	8.00000	1,800.00
01/29/13	Preparation for trial - prior to appearing in court	2.50000	562.50
01/30/13	Trial - District Magistrate Judge Timothy Rice	9.00000	2,025.00
02/01/13	Correspondence to Judge Rice	0.33333	75.00

Date	Memo	Hours	Amount
02/01/13	Correspondence to Matthew Weisberg, Esquire	0.33333	75.00
02/25/13	Prepare fax sheet	0.20000	45.00
02/25/13	t/c the chambers of the Honorable Magistrate Judge Timothy R. Rice	0.20000	45.00
02/25/13	Correspondence to the Honorable Magistrate Judge Timothy R. Rice	0.60000	135.00
02/25/13	Correspondence to Matt Weisburg, Esq	0.33333	75.00
03/07/13	Correspondence to The Honorable Magistrate Judge Timothy R. Rice	0.33363	75.00
03/07/13	t/c (c) Jacquelyn Coyle	0.10000	22.50
03/07/13	Entry into inner office memo	0.10000	22.50
03/07/13	t/c Novak/Francia - Jacquelyn Coyle	0.20000	45.00
03/07/13	Entry into inner office memo	0.20000	45.00
03/07/13	Review correspondence forwarded by Jacquelyn Coyle	0.20000	45.00
03/07/13	Review court order entered February 27, 2013	0.20000	45.00
03/07/13	t/c from Jacquelyn Coyle	0.20000	45.00
03/07/13	Entry into inner office memo	0.20000	45.00
03/07/13	t/c Rich Romannelli	0.30000	67.50
03/07/13	Review Revised Payroll Compliance Review Reports submitted by Jacquelyn Coyle	0.75000	168.75
03/07/13	Correspondence to Jacquelyn Coyle	0.33333	75.00
03/07/13	Correspondence to Matthew B. Weisberg, Esquire	0.33333	75.00
03/09/13	Correspondence to The Honorable Magistrate Judge Timothy R. Rice	0.33333	75.00
03/09/13	Correspondence to Matthew B. Weisberg, Esquire	0.33333	75.00
03/22/13	Review correspondence and proposed court order forwarded by Matt Weisberg, Esq	0.33333	75.00
03/27/13	t/c Matt Weisberg, Esquire	0.30000	67.50
03/27/13	Entry into inner office memo	0.30000	67.50
03/27/13	Participated in telephone conference convened by Magistrate Judge Rice	0.40000	90.00
03/28/13	Review minute entry regarding proceedings held before MAGISTRATE JUDGE TIMOTHY R. RICE Telephone...	0.20000	45.00
04/09/13	Corresp to Judge Rice	0.33333	75.00
04/09/13	Corresp to Matthew Weisberg, Esquire	0.33333	75.00
04/16/13	Prepare draft of Findings of Fact and Conclusions of Law	4.40000	990.00
04/17/13	Prepare draft of Findings of Fact and Conclusions of Law	7.20000	1,620.00
04/18/13	Review e-mail forwarded by Jacquelyne Coyle, CPA	0.20000	45.00
04/18/13	E-mail to Jacquelyne Coyle, CPA	0.20000	45.00
04/18/13	t/c Jacquelyne Coyle, CPA	0.20000	45.00
04/18/13	t/c Jacquelyne Coyle, CPA	0.20000	45.00
04/18/13	Entry into inner office memo	0.20000	45.00
04/18/13	t/c Jacquelyne Coyle, CPA	0.30000	67.50

Date	Memo	Hours	Amount
04/18/13	Review Payroll Compliance Review - Combines Summary revised 4-18-13	0.30000	67.50
04/18/13	Review Payroll Compliance Review - Combines Summary revisions 4-18-13	0.30000	67.50
04/18/13	Prepare Declaration of Counsel	0.40000	90.00
04/18/13	Finalize Findings of Fact and Conclusions of Law	4.00000	900.00
04/18/13	Prepare Post-Trial Memorandum of in support of the Causes of Action Set Forth in the Complaint	6.50000	1,462.50
04/19/13	Prepare Post-trial Memorandum of in Support of the Causes of Action Set Forth in the Complaint	5.20000	1,170.00
04/22/13	Prepare Findings of Fact and Conclusions of Law and Memorandum of Law	5.40000	1,215.00
04/22/13	Draft correspondence to Judge Rice	0.33333	75.00
04/22/13	Draft correspondence to Matthew B. Weisberg, Esquire	0.33333	75.00
04/22/13	Draft correspondence to Ed Coppinger, Local Union No. 98 Business Agent	0.33333	75.00
		322.61661	72,588.75
05/27/11	Conference Ed Coppinger and Marcos Rivera - review of checks issued by RGB Services	4.50000	1,237.50
03/12/12	t/c Matt Weisberg Esq	0.20000	55.00
03/16/12	t/c from Ted Tsiouris	0.30000	82.50
04/02/12	Review court order	0.30000	82.50
07/06/12	Prepare addendum to subpoenas	0.40000	110.00
07/24/12	Prepare draft of response in opposition to Defendants' Motion for Summary Judgement	4.40000	1,210.00
08/07/12	Correspondence to Matthew Weisberg, Esquire	0.33333	91.67
		10.43	2,869.17
Attorney Hours (322.61661*225.00)		72,588.75	
Attorney Hours (10.43*275.00)		2,869.17	
		<u>75,457.92</u>	



Date	Memo	Hours	Amount
03/11/10	Inner office filing	0.33333	28.33
06/15/10	Inner office filing	0.33333	28.33
06/15/10	Copy and binding demand package	0.75000	63.75
07/15/10	Inner office filing	0.33333	28.33
07/15/10	Copy and bind Complaint	0.50000	42.50
07/15/10	File Complaint US District Court	0.50000	42.50
08/23/10	Inner office filing	0.30000	25.50
08/23/10	Electronically file executed Summons for service of Complaint upon RGB Services, LLC, Michael Me...	0.50000	42.50
09/03/10	Inner office filing	0.33333	28.33
02/17/11	Inner office filing	0.33333	28.33
02/28/11	Inner office filing	0.33333	28.33
02/28/11	Copy and binding	0.30000	25.50
03/15/11	Entry inner office memo	0.20000	17.00
03/15/11	t/c to Robert P. Cocco, Esquire	0.30000	25.50
03/21/11	Entry inner office memo	0.33333	28.33
03/21/11	Email sent to Matt Weisberg, Esquire	0.33333	28.33
03/21/11	Inner office filing	0.33333	28.33
03/21/11	t/c to Robert Cocco, Esquire	0.20000	17.00
03/22/11	t/c to Jacqueline Coyle	0.20000	17.00
03/22/11	t/c to Matt Weisberg, Esquire	0.20000	17.00
03/22/11	Entry inner office memo	0.20000	17.00
03/29/11	t/c to Matt Weisberg, Esquire	0.20000	17.00
03/29/11	Entry inner office memo	0.20000	17.00
03/31/11	Entry inner office memo	0.33333	28.33
03/31/11	t/c to Matt Weisberg, Esquire	0.33333	28.33
03/31/11	Email Matt Weisberg, Esquire	0.33333	28.33
03/31/11	t/c Ed Coppinger	0.30000	25.50
04/04/11	Inner office filing	0.33333	28.33
04/04/11	Inner office filing	0.33333	28.33
04/19/11	Inner office filing	0.33333	28.33
07/19/11	Inner office filing	0.30000	25.50
07/19/11	Copy & Bind Complaint	0.50000	42.50
07/19/11	File Complaint with Clerk of Courts	0.50000	42.50
07/22/11	Inner office filing	0.33333	28.33
12/31/11	Inner office filing	0.33333	28.33

Date	Memo	Hours	Amount
12/31/11	Copy and binding	0.50000	42.50
01/10/12	Inner office filing	0.33333	28.33
01/23/12	Inner office filing	0.33333	28.33
01/23/12	Copy and binding	0.20000	17.00
01/28/12	Inner office filing	0.33333	28.33
02/07/12	Entry inner office memo	0.10000	8.50
02/07/12	t/c to Matthew Weisberg, Esq.	0.20000	17.00
02/09/12	Inner office filing	0.33333	28.33
02/09/12	Entry inner office memo	0.10000	8.50
02/09/12	t/c to Matthew Weisberg, Esq.	0.20000	17.00
02/09/12	t/c to Sexton Court Reporting	0.20000	17.00
03/15/12	Inner office filing	0.33333	28.33
03/15/12	Entry inner office memo	0.20000	17.00
03/15/12	t/c to Matthew Weisberg, Esquire	0.30000	25.50
03/16/12	Inner office filing	0.33333	28.33
03/20/12	t/c from Heather, Matt Weisberg, Esq office	0.20000	17.00
03/20/12	Inner office filing	0.30000	25.50
03/20/12	Entry inner office memo	0.30000	25.50
04/02/12	Inner office filing	0.33333	28.33
04/10/12	Inner office memo	0.33333	28.33
04/13/12	Inner office filing	0.60000	51.00
04/27/12	t/c to Matthew Weisberg, Esq	0.20000	17.00
04/27/12	Inner office filing	0.30000	25.50
04/27/12	Entry inner office memo	0.30000	25.50
05/02/12	t/c Matthew Weisberg, Esq	0.20000	17.00
05/02/12	Entry inner office memo	0.20000	17.00
05/03/12	Inner office filing	0.33333	28.33
05/03/12	t/c Matthew Weisberg, Esq	0.20000	17.00
05/03/12	Entry inner office memo	0.20000	17.00
05/03/12	t/c Ed Coppinger	0.20000	17.00
05/03/12	t/c Jacquelyn Coyle	0.20000	17.00
05/22/12	Inner office filing	0.33333	28.33
05/22/12	Bates stamp discovery and update index	0.50000	42.50
05/22/12	Copy RGB work orders and invoices	2.00000	170.00
05/24/12	Copy discovery to provided to opposing counsel	0.50000	42.50
05/25/12	Inner office filing	0.20000	17.00

Date	Memo	Hours	Amount
06/04/12	Inner office filing	0.33333	28.33
06/04/12	Scan and file defendant's expert report	0.30000	25.50
07/02/12	Meeting with Ed Coppinger	1.00000	85.00
07/05/12	Inner office filing	0.30000	25.50
07/05/12	Copy & Bind Subpoenas	0.40000	34.00
07/06/12	Inner office filing	0.30000	25.50
07/06/12	Copy & Bind Subpoenas	0.40000	34.00
07/09/12	Entry inner office memo	0.20000	17.00
07/09/12	t/c from Bob Loftus of LinkSource to discuss Subpoena	0.30000	25.50
07/17/12	Inner office filing	0.33333	28.33
07/17/12	Inner office filing	0.33333	28.33
07/20/12	Entry inner office memo	0.20000	17.00
07/20/12	t/c Ed Coppinger	0.40000	34.00
07/24/12	Inner office filing	0.20000	17.00
07/24/12	t/c Marco Rivera	0.30000	25.50
07/24/12	Prepare inner office memo	0.40000	34.00
07/24/12	Inner office filing	0.60000	51.00
07/24/12	Conform discovery binder and Bates stamp	1.60000	136.00
07/30/12	Copy and bind Plaintiffs' Response to Defendants' Motion for Summary Judgment	0.50000	42.50
07/31/12	t/c Marco Rivera	0.33333	28.33
07/31/12	Entry inner office memo	0.33333	28.33
07/31/12	Collect signed affidavit of Ed Coppinger	0.33333	28.33
07/31/12	t/c Deb Gerber	0.20000	17.00
07/31/12	t/c Ed Coppinger	0.20000	17.00
07/31/12	t/c Jeff Scarpello, Esquire	0.20000	17.00
07/31/12	Copy and bind Exhibits attached to Plaintiffs' Response to Defendants' Motion for Summary Judgment	1.00000	85.00
08/01/12	Entry inner office memo	0.33333	28.33
08/01/12	Collect signed affidavit of Jeff Scarpello, Esquire	0.33333	28.33
08/01/12	Conference with Marco Rivera	0.40000	34.00
08/01/12	Electronically file Plaintiffs' Response to Defendants' Motion for Summary Judgment and Appendix...	0.50000	42.50
08/01/12	Inner office filing	0.50000	42.50
08/01/12	Hand Deliver Plaintiffs' Response to Defendants' Motion for Summary Judgment and Exhibits to Jud...	0.50000	42.50
08/07/12	Update Discovery Index	0.33333	28.33
08/07/12	Inner office filing	0.50000	42.50

Date	Memo	Hours	Amount
08/07/12	Scan and bates stamp documents received from Spencer Technologies	3.00000	255.00
08/08/12	Inner office filing	0.33333	28.33
08/08/12	Inner office filing	0.20000	17.00
09/04/12	Inner office filing	0.33333	28.33
09/04/12	Update Discovery Index	0.20000	17.00
09/04/12	Scan and bates stamp records received from Playnetwork	2.00000	170.00
09/21/12	Inner office filing	0.33333	28.33
09/21/12	Inner office filing	0.33333	28.33
09/24/12	Inner office filing	0.33333	28.33
09/24/12	t/c from Ed Coppinger	0.20000	17.00
09/24/12	Entry inner office memo	0.30000	25.50
09/24/12	t/c Marco Rivera	0.30000	25.50
09/24/12	Inner office filing	0.40000	34.00
09/24/12	Copy and bind Supoenas	0.50000	42.50
09/28/12	Inner office filing	0.60000	51.00
10/02/12	Inner office filing	0.33333	28.33
10/02/12	Copy and bind Subpoenas to appear for trial - Ed Coppinger, Jacquelyn Coyle, Edgar Soto, Son Tuy...	0.33333	28.33
10/08/12	Inner office filing	0.33333	28.33
01/28/13	Preparation for trial - prior to appearing in court	2.00000	170.00
01/28/13	Trial - District Magistrate Judge Timothy Rice	8.00000	680.00
01/29/13	Preparation for trial - prior to appearing in court	2.00000	170.00
01/30/13	Trial - District Magistrate Judge Timothy Rice	9.00000	765.00
02/01/13	Inner office filing	0.33333	28.33
02/01/13	Copy and mark exhibits received from Jacquelyn Coyle	0.43333	36.83
02/22/13	t/c David Hayes, Court electronic recording/transcript	0.33333	28.33
02/22/13	Entry inner office memo	0.33333	28.33
02/22/13	t/c Matthew Weisberg, Esquire	0.20000	17.00
03/07/13	Inner office filing	0.33333	28.33
03/09/13	Copy and binding	0.20000	170.00
03/09/13	Inner office filing	0.33333	28.33
03/22/13	Inner office filing	0.33333	28.33
04/05/13	Email trial transcripts to Judge Rice	0.33333	28.33
04/05/13	Entry inner office memo	0.20000	17.00
04/05/13	t/c Judge Rice chambers	0.30000	25.50

**RGB Services**

Date	Memo	Hours	Amount
04/08/13	Bind trial transcripts	0.50000	42.50
04/09/13	Inner office filing	0.33333	28.33
04/09/13	Hand Deliver trial transcripts to Judge Rice	0.75000	63.75
04/22/13	Inner office filing	0.33333	28.33
		75.10	6,536.32

**Paralegal Hours (75.10\*85.00)**

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**6,536.32**

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## RGB Services

Date	Memo	Amount
07/15/10	Complaint	350.00
07/31/10	Copies	90.30
08/20/10	Complaint of Civil Action - Ed Trotter	65.00
05/31/11	Prepare draft	81.93
07/27/11	Postage	10.25
10/31/11	IBEW - RGB Services	630.30
03/12/12	Copies-Correspondence	2.10
03/19/12	Copies-Discovery	92.05
04/12/12	Copies - Correspondence	9.10
05/01/12	Transcripts - RGB (Petsikas)	1,128.40
05/22/12	Copies - Discovery	207.55
05/24/12	Copies - Discovery	217.00
05/25/12	Copies -	27.30
06/21/12	Transcripts - RGB Services	526.30
06/26/12	Transcript - RGB Services	526.30
06/30/12	Postage	1.30
06/30/12	Copies	6.65
07/06/12	Copy - Subpoenas	29.40
07/23/12	Copies - Submission	7.70
07/24/12	Copies - Discovery	32.20
07/26/12	Filings/maillings, etc	51.75
07/31/12	Postage	2.70
07/31/12	Postage	0.45
08/01/12	Copies	790.50
08/08/12	Staples Copies	201.97
08/08/12	Copies - Subpoena Records	840.50
08/27/12	Filings/maillings, etc	11.00
09/04/12	Copies - Playnetwork	314.00
09/04/12	Postage	1.30
09/18/12	Copies - Pre-trial Memo	54.00
09/19/12	Postage	4.20
09/24/12	Copies - Correspondence & Subpoenas	18.00
09/25/12	Postage	4.05
09/27/12	Copies - Trial Exhibits	170.00
09/28/12	Copies - Export Reports	21.00
09/29/12	Copies - Exhibits	27.00

**RGB Services**

Date	Memo	Amount
10/01/12	Copies - Trial Exhibits	548.50
10/02/12	Copies - Correspondence&Subpoenas	6.00
10/30/12	Postage	1.90
10/30/12	Postage	2.70
11/01/12	Transcripts - RGB Services	650.16
01/27/13	Copies - Exhibits	291.00
01/27/13	Copies - Examinations	35.50
01/28/13	Copies - Exhibits	238.00
01/28/13	Copies - Examinations	48.00
01/30/13	Copies - Exhibits	839.00
02/01/13	Correspondence to M. Weissberg, Esquire	1.62
02/01/13	Correspondence to M. Weissberg, Esquire	2.12
02/01/13	Trial Exhibits	71.00
02/25/13	Correspondence to J Rice	0.46
02/26/13	Correspondence to M Weisberg	0.46
02/26/13	Postage	17.00
02/26/13	Postage	17.00
02/26/13	Transcript - RGB Services	1,445.50
02/26/13	Starbucks	107.76
03/06/13	Copies	7.00
03/06/13	Copies	13.00
03/07/13	Postage	0.46
03/09/13	Copies	17.00
03/11/13	Postage	0.66
03/11/13	Postage	0.66
04/08/13	Binder Costs	58.26
04/08/13	Copying Costs	166.04
04/08/13	Transcript - RGB Services	51.62
04/09/13	Postage	0.46
	<b>Costs</b>	<u>11,192.39</u>